

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Kenan Kerim

Case No.

Case: 2:23-mj-30137

Assigned To : Unassigned

Assign. Date : 4/4/2023

USA V. SEALED MATTER (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 2020 through April 5, 2020 in the county of Wayne and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. § 875(d)

18 U.S.C. § 2261A(2)(B)

Offense Description

Sending threatening communications

Online stalking

This criminal complaint is based on these facts:
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: April 4, 2023

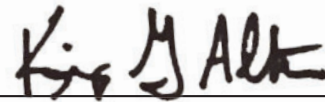
City and state: Detroit, Michigan



Complainant's signature

Adam Christensen, Special Agent (FBI)

Printed name and title



Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR
A COMPLAINT AND ARREST WARRANT**

I, Adam Christensen, having been first duly sworn, do hereby depose and state as follows:

INTRODUCTION

1. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since 2010 and am currently assigned to the Detroit Division. While employed by the FBI, I have investigated federal criminal violations related to online crimes including child exploitation and child pornography. I have gained experience through training and everyday work relating to conducting these types of investigations. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 875(d) and 2261A and I am authorized by the Attorney General to request an arrest warrant.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **Kenan Kerim** for violations of 18 U.S.C. §§ 875(d) (threatening communications) and 2261A(2)(B) (online stalking).

3. The statements contained in this affidavit are based in part on the following: written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; independent investigation and analysis by law enforcement officers/analysts and computer forensic professionals; and my experience, training, and background as a special agent (SA) with the FBI. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that **Kerim** has violated 18 U.S.C. §§ 875(d) and 2261A(2)(B).

PROBABLE CAUSE

4. On September 29, 2020, Adult Victim 6, hereafter AV6, who resides in the Eastern District of Michigan, was interviewed. During the interview, she stated that in approximately March 2020, she was contacted by multiple accounts on Instagram that were threatening her and began contacting her friends. The first person was named “Mason Patterson” and likely had the username mapas***. This account had sent her a nude image of herself and asked her for more images. AV6 said she would for \$20, which the person sent through Venmo linked to the email address pattersonmason***@gmail.com. When she did not send additional images, they began to threaten her and made multiple accounts to harass her once she blocked

them. They threatened to post her nude photographs if she did not send more. A coworker sent a link to AV6 to a website in which she found nude images of herself posted on this website, two of which had been the images sent to her by “Mason Patterson.” The post which contained the image of AV6 had been posted by username “Anonymous”. AV6 also received a set of nude photos of her friends and herself from the individual making threats once she reported the matter to the police on April 5, 2020. She made the police report because on that day she had received a message “unblock me or absolutely regret it. I’m not playing anymore. Give me my video and then fuck off. You have until 10 to respond to me” and felt that the person was directly threatening her and she did not know what they were capable of doing to harm her.

5. Subscriber information for the email address pattersonmason***@gmail.com was requested from Google on September 10, 2020. On September 14, 2020, Google returned information that the subscriber was listed as “Mason Patterson” and listed a telephone number of 734-796-****. The IP logs for the account also showed that a recent login to the account came from IP address 2601:402:4402:5410:e982:fe0e:ffca:c048 on August 17, 2020. The account was created on February 20, 2020 from IP address 198.98.52.10.

6. On September 17, 2020, subscriber information for the telephone number 734-796-**** was requested from AT&T Mobility via subpoena. On the same day,

AT&T Mobility returned information that the subscriber was listed as **Kenan Kerim** with an associated email address of kenan.kerim**@gmail.com.

7. On September 17, 2020, subscriber information for the IP address 2601:402:4402:5410:e982:fe0e:ffca:c048 on August 17, 2020 was requested from Comcast by subpoena. On September 22, 2020, Comcast returned information that the subscriber was **Kenan Kerim** at an address in Canton, Michigan. The telephone associated with the Comcast account was listed as 734-796-****.

8. On October 1, 2020, subscriber and transaction information for the Venmo account associated with email address pattersonmason***@gmail.com was requested from Venmo by subpoena. On October 30, 2020, Venmo returned information that the listed subscriber was **Kenan Kerim** at an address in Canton, Michigan 48187. The telephone associated with the Venmo account was 734-796-**** and there were three associated email addresses, which included kenan.kerim**@gmail.com and pattersonmason***@gmail.com. There was also an IP address login to the account from IP address 198.98.51.87 on April 20, 2020. The transaction log for the account showed that on March 15, 2020, there was a completed payment sent of \$20 to Adult Victim 6. On March 16, 2020, there was another completed payment of \$0.10 to Adult Victim 6 with a message of “Send that 20 back. Unless you want to unblock me and make a deal.”

9. Based in part on the above information, a search warrant was authorized in the Eastern District of Michigan for the residence of **Kenan Kerim** which was executed on February 10, 2021. During the execution of the search warrant, **Kerim** voluntarily agreed to be interviewed and stated during the interview that he had a personal Instagram account and that his personal email address was kenankerim**@gmail.com. He also admitted to using the email address pattersonmason***@gmail.com, but refused to answer any further questions.


10. On February 22, 2021, another victim came forward with information regarding **Kenan Kerim**. During the interview, the victim, Adult Victim 10, hereafter AV10, a female who resides in the Eastern District of Michigan and was born in 1985, stated that she had previously had a brief romantic relationship with **Kerim**. After the relationship ended, **Kerim** was upset by it. More recently, beginning in March 2020, AV10 had received messages from accounts on Instagram and Snapchat from a user(s) who claimed to know AV10 and requesting nude images from her in exchange for money. The user(s) sent a nude photo of a coworker of AV10 to AV10, and when AV10 talked to that coworker, found out the user was attempting to extort the coworker for additional photos and trying to get information regarding AV10. AV10 provided a screenshot of an Instagram account with username roberttomas** which stated “Block me again; And I put her on blast” and then provided three nude photos of AV10’s coworker discussed above. AV10 attempted to block the user, but they

created new accounts to continue to harass her. There are indications from my investigation that **Kerim** was the user threatening AV10 and additional other victims as well, such as subpoena responses regarding the Instagram accounts used to contact AV10 which showed logins from an IP address which was leased to **Kerim** at his residence by Comcast.

CONCLUSION

11. Based on the foregoing, there is probable cause to believe that **Kenan Kerim** has made threatening communications, in violation of Title 18, United States Code, Section 875(d), and committed online stalking, in violation of Title 18, United States Code, Section 2261A(2)(B).

Respectfully submitted,



Adam Christensen, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.

HON. KIMBERLY G. ALTMAN
UNITED STATES MAGISTRATE JUDGE

Date: